



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ELM
F. #2015F01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 9, 2018

By ECF

Robert J. Cleary, Esq.
Dietrich L. Snell, Esq.
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Eleven Times Square
New York, NY 10036

Re: United States v. Dan Zhong and Landong Wang
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government's filter team hereby furnishes discovery with respect to the above-captioned matter. This disclosure supplements the filter team's earlier disclosures under cover of letters dated May 24, 2017, July 12, 2017, August 8, 2017, October 23, 2017, October 26, 2017 and July 24, 2018.

Enclosed are copies of additional emails sent to or received by the email account associated with the address "zhongdan515@msn.com" (the "Zhong Email Account"), beyond those previously produced, which bear Bates numbers DZFILTER00015507 through DZFILTER00015585. Please note that these materials may contain privileged attorney-client communications. The prosecution team has not reviewed these materials.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Elizabeth L. Macchiaverna
Elizabeth L. Macchiaverna
Assistant U.S. Attorney
(718) 254-6351

cc: Clerk of the Court (DLI) (by ECF)